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5 | Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

V.

APPROXIMATELY \$9,960.00 IN
U.S. CURRENCY,

Defendant.

2:20-MC-00073-TLN-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Tunisha Vance (“claimant”), by and through their respective counsel, as follows:

1. On or about January 10, 2020, claimant filed a claim in the administrative forfeiture proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$9,960.00 in U.S. Currency (hereafter “defendant currency”), which was seized on October 26, 2019.

2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
2 parties. That deadline was April 9, 2020.

3 4. By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 8,
4 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. By Stipulation and Order filed July 1, 2020, the parties stipulated to extend to September
8 7, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
12 to November 6, 2020, the time in which the United States is required to file a civil complaint for
13 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
14 currency is subject to forfeiture.

15 7. Accordingly, the parties agree that the deadline by which the United States shall be
16 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
17 alleging that the defendant currency is subject to forfeiture shall be extended to November 6, 2020.

18 Dated: 9/2/2020

McGREGOR W. SCOTT
United States Attorney

19 By: /s/ Kevin C. Khasigian
20 KEVIN C. KHASIGIAN
21 Assistant U.S. Attorney

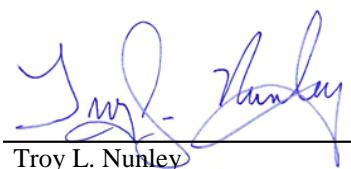
22 Dated: 9/2/2020

23 /s/ Jacek W. Lentz
24 JACEK W. LENTZ
25 Attorney for potential claimant
Tunisha Vance

26 (Signature authorized by email)

IT IS SO ORDERED.

27 Dated: September 2, 2020

28 
Troy L. Nunley
United States District Judge